



**JOINT DECLARATION OF
SHERRY LICHTENBERG
& MINDY CHAPMAN**

ATTACHMENT 7

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October 19, 2000

Mr. Marcel Henry, Vice President
WorldCom
Two Northwinds Center
2570 Northwinds Parkway
Alpharetta, GA 30004

Marcel:

We have conducted extensive analysis of the notifiers reported to us in your October 10th letter and would like to update you on the status. The Verizon team has been working diligently to resolve these issues. Prior to your call to Peg Ricca, Verizon had completed the root cause analysis of the Pennsylvania log and shared both the results and selected short-term solutions with WorldCom. This information was reviewed again on our October 3rd status call with WorldCom.

Verizon understands the business impact of not receiving notifiers in a timely fashion. These UNE Platform PONs are "stuck" in our business process – that is to say that the billing completion notifier that WorldCom expected to receive had not yet been generated because the billing system had not yet been updated. Although the vast majority of orders are completed within a reasonable timeframe, there is still a small percentage to be resolved.

In New York, for the period of time from June through September, WorldCom sent approximately 354,000 orders to Verizon. As of 10/18/2000 Verizon has successfully processed 99.75% of these orders, leaving approximately 0.25% (875 orders) to be completed. The majority of the 875 outstanding PONS are in an internal cancel status. Verizon must work with WorldCom to determine the final disposition of these PONS. The remaining PONS are in jeopardy status. The WCCC will provide a complete list of all PONS by October 20th.

In Pennsylvania, for the period of time from August through September, WorldCom submitted approximately 23,200 orders to Verizon. As of 10/18/2000 Verizon has successfully processed 97.3% of these orders, with approximately 2.7% (630 orders) to be completed. The majority of the 630 outstanding PONS are awaiting the billing completion notifier. Verizon is continuing to work these internally wherever possible. The remaining PONS are in a jeopardy status. The WCCC will provide a complete list of PONS by October 20th and work with WCOM to determine final resolution.

Based on our analysis, there are several reasons why these problems have occurred. The following is a description of the problems and the specific actions taken to resolve these issues in New York and Pennsylvania.

New York

- The primary cause for delayed notification in New York were PCDs and Verizon's cancellations of service orders without communicating this status to WorldCom. Verizon will work with WorldCom to resolve the orders that are in an internal cancel status and jeopardy status.

Pennsylvania

- Migration orders are processed by the issuance of multiple internal service orders. Under certain circumstances, these individual service orders are posted to the Billing System in the wrong order causing the order to go into post completion discrepancy (PCD) error that requires manual intervention to resolve these errors. Although the order is provisioned, this manual intervention results in a delay in issuing the billing completion notifier.

Resolution: system enhancements will be implemented this weekend to mitigate this situation. Verizon is also assessing additional systems enhancements in this area.

- In a few cases, it is possible that during the transmission of PCN and BCN notifiers between systems at Verizon that the BCN "races" ahead of the PCN. This causes the order to error as the BCN assumes that PCN should have completed first. Although the order is provisioned, it requires manual intervention by a Verizon representative to send the actual provisioning and billing completion notifiers to WorldCom. This manual intervention results in a delay in sending the notifiers.

Resolution: Verizon has scheduled a solution to be implemented with our December 2000 software release. This solution will systematically identify this condition and automatically send out both the PCN and the BCN when the PCN is received.

-There are also situations where a Verizon cancels an order based upon WorldCom's request, but also sends a provisioning completion notice in error. These orders will never receive a billing completion notifier as the order is actually cancelled.

Resolution: Verizon will implement a system change to stop generating these completion notices as of the October release this weekend.

-There are a number of PONs in a jeopardy status or that were cancelled after being in jeopardy status for a prolonged length of time. In the past, the

notification of these jeopardies and cancellations may have been verbal and no electronic notification process existed to communicate this information between Verizon and WorldCom.

Resolution: With Verizon's October 21, 2000 software release, a new electronic jeopardy status notifier will be implemented which will provide WorldCom with an electronic jeopardy or cancellation status. This notification will ensure WorldCom has a status on orders in jeopardy or cancelled so that WorldCom will know not to expect a completion notifier until there is appropriate resolution.

In response to your questions regarding the responsibilities of the Wholesale Customer Care Center, it is the WCCC's responsibility to:

- ☐ interface with the CLEC customer
- ☐ accept trouble tickets for missing notifiers
- ☐ follow through resolution of all Verizon issues
- ☐ communicate resolution to the CLEC customer

The WCCC works with the appropriate Verizon departments to perform root cause analysis and initiate corrective actions. Through the existing PON Exception trouble ticket process, Verizon currently statuses all trouble ticket PONs within 3 business days and also resends electronic notifiers within 3 business days when the notifier exists.

Recently, we integrated the WCCC and the CLEC Customer Support group into one organization, headed by Marion Jordan, Vice President - CLEC Support. This new structure will provide better responsiveness and closer supervision of Verizon's CLEC processes and system support. Ms. Jordan will have primary management responsibilities and serve as our escalation point for CLEC issues related to the WCCC.

In summary, Verizon feels confident that, with the system and process changes outlined in this correspondence, we will be able to address these issues in New York and Pennsylvania.

Verizon appreciates your business and we are committed to deliver on our company's promise of excellent value and service. If you have any questions please feel free to contact me on 212-395-4641 or Marion Jordan on 703-974-2123.

Sincerely,



Cc: V. Ruesterholz
M. Jordan
P. Ricca
D. Goff

**JOINT DECLARATION OF
SHERRY LICHTENBERG
& MINDY CHAPMAN**

ATTACHMENT 8



November 1, 2000

VIA EMAIL

Mr. Daniel M. Martin
New York Department of Public Service
Three Empire State Plaza
Albany, New York 12223
daniel_martin@dps.state.ny.us

Dear Dan:

I am writing to bring to your attention the re-emergence of a problem related to EDI notifiers.

Our business team has been trying to address with their counterparts at Verizon the backlog of missing notifiers for our UNE-P orders. WorldCom sent a letter to Verizon on October 10, in part because the backlog had grown to approximately 1,500 orders, dating back to June 2000. Verizon responded by letter on October 19, stating that WorldCom should not expect to receive billing completion notices for the orders in question, because the orders had not completed.¹

Verizon's response raises two concerns. First, Verizon states that for the majority of the orders, no billing completion notices are due because the orders are in "internal cancel status." That is, Verizon canceled our orders and never told us.² Further, some of these orders date back for about five months, but we are only now learning that Verizon canceled them.

Verizon cannot unilaterally cancel WorldCom's orders. Nor can Verizon take five months to respond to WorldCom's order backlog. Verizon has acknowledged in our business-to-business conversations that it should not be canceling our orders, yet nevertheless its technicians are doing so. In that these orders are being canceled and we're not being told of the cancellations, the impact of this failure by Verizon to follow correct procedures is the same impact that we saw when notifiers were being lost -- namely, our orders appear lost and we cannot advise our customers of status. As you

¹ The two letters are attached to this transmission. WorldCom currently is missing notifiers for 1446 orders: 92 from June, 4 from July, 71 from August, 124 from September, and 1155 from October.

² Verizon states that its systems do not identify "internal cancel" status, and thus its systems could not notify us of this status. Of course, Verizon's inability to notify us of the internal cancel status only exacerbates the threshold problem -- Verizon should never be canceling these orders in the first place.

Mr. Daniel M. Martin
November 1, 2000
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know from the problems we encountered with ECXpert, the ramifications of lost orders – or orders inappropriately canceled with no notice – is devastating to our business.

WorldCom conducts weekly working sessions with Verizon. Unfortunately, too often WorldCom must escalate problems beyond these working sessions in order to reach resolution, and, in this case, Verizon's escalation response itself is a great cause of concern. It is our hope that Verizon will immediately implement the necessary training and process changes to eliminate this problem without the need for formal Commission intervention. I will keep you apprised of our discussions with Verizon, and please feel free to call me with any questions.

Respectfully submitted,

Curtis L. Groves

Copies: Ms. Mindy Chapman (mindy_chapman@wcom.com)
Mr. Marcel Henry (marcel.henry@wcom.com)
William D. Smith, Esq. (william.d.smith@verizon.com)

**JOINT DECLARATION OF
SHERRY LICHTENBERG
& MINDY CHAPMAN**

ATTACHMENT 9



December 5, 2000

BY EMAIL AND OVERNIGHT COURIER

Mr. Daniel M. Martin
New York Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350

Re: Request for Expedited Dispute Resolution

Dear Mr. Martin:

I am writing on behalf of WorldCom, Inc. ("WorldCom") to request Expedited Dispute Resolution to resolve an issue between WorldCom and Verizon New York ("Verizon").

Earlier this year, failures in Verizon's OSS caused thousands of WorldCom's orders for UNE-P local service to be lost. In the matter addressed in Cases 00-C-0008 and 00-C-0009, Verizon replaced its defective ECXpert with NetLink, which addressed the majority of the problems that CLECs such as WorldCom were experiencing.

However, since the March 2000 transition to NetLink, there has always been an outstanding quantity of orders which have remained unprovisioned and unaccounted for. This group of orders has grown significantly of late and currently stands at more than 2100 orders.

Of the over 2100 orders that are awaiting confirmations or completion notices, some date back to June 2000. Verizon's Help Desk has provided virtually no help in clearing the order backlog or the associated trouble tickets, and, despite executive-level communications and weekly working-level conference calls, Verizon has shown almost no willingness to address this problem.

WorldCom has asked Verizon for root-cause analysis of why these orders are not being provisioned. Verizon has offered only one explanation – that many of the orders were canceled unilaterally by Verizon. This is an entirely unacceptable course of action by Verizon, and despite its acknowledgment that it should not be canceling our UNE-P orders, Verizon has not offered any plan to stop this anticompetitive behavior and in fact has at times attempted to justify it.

WorldCom does not know why more than 2100 of its orders await EDI notifiers. There may be provisioning problems, process problems, systems problems, or other explanations. We know only that the backlog of orders is growing, and that Verizon does not respond to trouble tickets in a timely fashion. We need both to be addressed. We need Verizon to respond to our trouble tickets by providing the missing notifier – rather than merely providing the status of the order and then hiding behind the carrier-to-carrier metrics for trouble-ticket clearance that it has misreported since their inception – and we need them to identify and eliminate the root causes that are generating this order backlog.

I have attached a spreadsheet that lists the current volume of missing notifiers. I have also attached WorldCom's November 1, 2000 letter to Staff regarding this matter, which includes as an attachment letters exchanged between WorldCom and Verizon executives in October. These letters evidence WorldCom's attempts to resolve this matter through meetings, letters, and conference calls.

WorldCom is available to discuss this issue with you and Verizon at any time. Please let me know if you would like additional information.

Very truly yours,

Curtis L. Groves

Copies: Mr. Allan H. Bausback
Peter M. McGowan, Esq.
Robert T. Mulig, Esq.

William D. Smith, Esq.

Ms. Mindy Chapman
Ms. Patricia B. Woods

**JOINT DECLARATION OF
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ATTACHMENT 10

Verizon New York Inc.

158 State Street
Room 1000A
Tel. 518 396-1001
Fax 518 465-0385

William R. Allan

Vice President Regulatory Affairs



December 15, 2000

BY HAND

Mr. Daniel Martin
Chief Intercarrier Coordination
New York State Department of Public Service
Three Empire State Plaza
Albany, New York 12207

Re: WorldCom Request for Expedited Dispute Resolution

Dear Mr. Martin:

This letter responds to the issues raised by WorldCom in their December 5, 2000 letter to you requesting Expedited Dispute Resolution in matters pertaining to outstanding order notifiers.

Verizon Communications does not believe intervention by the Commission is necessary in this matter and wishes to emphasize several key points:

- 1) despite representations by WorldCom to the contrary, these are not cases of "missing notifiers" but in fact are orders that require further action by either Verizon or the CLEC for the order itself to be resolved;
- 2) Verizon has provided either the requested notifier or status information about every PON inquired upon by the CLECs, at least once and sometimes more than once;
- 3) Verizon personnel meet regularly with personnel from WorldCom to discuss their outstanding issues and actions required; and
- 4) Verizon is actively engaged to resolve its outstanding work items. There are a small number of instances where the corrective action required has been attempted and has not been successful, or requires further analysis to determine if it can be corrected, or if the order should be cancelled.

CONFIDENTIAL – Contains CLEC specific information

Verizon is continually working to improve its work practices and its communications and interactions with its customers. The process by which customers can determine order status includes tracking the status notifiers exchanged during the normal course of business and systems operations (Queries, Confirmations, Provisioning Completions, Billing Completions), using the automated Service Order Inquiry transaction, reviewing Electronic Jeopardy reports (OQS) and notifiers, receiving re-flowed notifiers or reviewing status files in response to submitting PON Exception trouble tickets.

We believe that the existing PON Exception Trouble Ticket process works well for the initial purpose for which it was intended, and that is to re-send notifiers that may not have been successfully sent/received to/by the CLECs. A complementary process has been implemented to address the orders for which the requested notifier does not yet exist because the PON has not reached the business state to produce the notifier. The process is generally working for this purpose as well. The process by which Verizon and its customers can agree as to the final disposition and resolution for a small percentage of unworkable orders is an area of ongoing discussion. These represent a very small percentage of overall orders. However, Verizon recognizes that each order must be resolved and works toward that objective.

The PON Exception Trouble Ticket Process

The PON Exception Trouble Ticket Process was developed in response to the circumstance that existed earlier this year when the EDI software used by Verizon in NY failed to reliably return status notifiers to CLECs. With the implementation of Verizon's Netlink software, Verizon now reliably returns EDI notifiers to CLECs. However, if for any reason the CLEC does not have an expected notifier, they use the PON Exception Trouble Ticket Process to report the delayed/missing notifier to Verizon. According to the defined process that has been reviewed by the FCC and published to CLECs through Change Management, Verizon responds to the Trouble Ticket within 3 business days. If the requested notifier (or one later in the life cycle process) exists, it is "re-flowed" to the CLEC. There are cases when the desired notifier does not yet exist because the PON has not reached the life cycle stage to generate the notifier. In this case, Verizon provides the status of the PON to the CLEC and identifies the action required to move the PON to the desired state.

Verizon "clears" the trouble ticket PON by re-flowing or statusing the PON as described above. Verizon does not "close" the PON trouble ticket until concurrence is obtained from the CLEC. This is not a unilateral process by Verizon. It is done through constant communication with each CLEC.

Moving PONs from "Cleared" to "Closed"

Information provided by Verizon to WorldCom in the working sessions reflects additional investigation and analysis performed by Verizon on WorldCom outstanding PONs. This analysis indicates that in some cases corrective action is required by Verizon, but there are also cases where the corrective action must be taken by the CLEC. Examples are provided in the Table 1 below:

Table 1: Examples of Corrective Actions

Circumstance	Action required	Responsible Party
Notifier requested is for a version of the PON different from the version of the PON that has completed provisioning and billing	The PON/Version being inquired upon by the CLEC will never be worked. The CLEC must close that PON/Version in their tracking system	CLEC
PCN not received as order not yet provisioned – No access to customer premise	Reschedule with customer, supplement order with new requested due date	CLEC
PCN not received as order not yet provisioned – No facilities	Advise of future facility availability and potential costs when required	Verizon
PCN not received as order not yet provisioned – Appointment missed, new due date needed	Reschedule with customer, supplement order with new requested due date	CLEC
PCN not received as order not yet provisioned – Order may have been confirmed, but change is required	Supplement order with changes (Supp type 3) or cancel (Supp type 1)	CLEC
BCN not received as order in post completion discrepancy (PCD) status	Correct billing records	Verizon
PCN not received as order cannot be provisioned – customer changed carrier before requested due date	Supplement order to cancel (supp type 1)	CLEC

Therefore any measurement of “average time to close” is a combination of both Verizon actions and CLEC actions. This will be illustrated in the review below of the specific WorldCom data.

NY PONs on Trouble Tickets

Overall, for the period May to November, of the 2,986,520 PONs received by Verizon for all CLECs in NY, 77,174 were reported on PON Exception Trouble Tickets representing 2.6% of the total PONs. Of those, 58% were cleared by re-flowing notifiers to CLECs within 3 business days of receiving the trouble ticket. The remaining 42% or approximately 1.1% of total PONs are PONs that fall out of the normal ordering, provisioning and billing processes and are statused to the CLEC within 3 business days. These PONs require further action by either the CLEC or Verizon to complete or resolve the order.

WorldCom Status

For the period June to November, WorldCom sent 537,179 NY PONs to Verizon. They reported 14,932 on PON Exception Trouble Tickets, which represents 2.8% of their total PON volume. Of these, Verizon cleared 41% within 3 business days by re-flowing the notifier to WorldCom. The remaining 59% were statused to WorldCom within 3 business days and required further action by either Verizon or WorldCom. Table 2 illustrates the monthly trouble ticket volume and total PON volume for WorldCom in NY. Although there are monthly variations in the data, there has not been a pattern of increasing numbers of missing/delayed notifiers either in absolute volumes or as a percentage of total PONs submitted.

Table 2: WorldCom PON and Trouble Ticket Volume, June to November

Month	LSRs Submitted To Verizon	PONs submitted on Trouble Tickets
June	88,798	3,655
		4.1%
July	89,422	1,594

CONFIDENTIAL – Contains CLEC specific information

		1.8%
August	82,812	3,039
		3.7%
September	92,813	755
		0.8%
October	91,968	4,255
		4.6%
November	91,366	1,634
		1.8%
Totals	537,179	14,932
Jun - Nov		2.8%

WorldCom and Verizon work together at least weekly to discuss and resolve outstanding PONs. WorldCom provides information to Verizon concerning their view of outstanding orders. The analysis reflected in this response anchors on two status files supplied by WorldCom to Verizon – one from November 22nd and the other from December 7th. The status and actions required to identify, close and reconcile the outstanding PONs are described below.

As of November 22nd, WorldCom reported 1,066 PONs as outstanding. On December 7th, WorldCom provided Verizon with a list of 1,495 outstanding PONs. This list added 11 PONs for the period prior to November, removed 247 PONs from July through November and added 665 PONs for November. This is illustrated in Table 3.

Table 3: WorldCom Lists of Outstanding PONs

	WCOM List of 11/22/00	PONs on the 11/22/00 list not on the 12/07/00 list	PONs on the 12/07/00 list not on the 11/22/00 list	WCOM List of 12/07/00
Month		(inferred closed)	(inferred re-opened or new)	
Jun	26	-	-	26
Jul	98	(5)	-	93
Aug	46	(8)	2	40
Sep	39	(9)	2	32
Oct	576	(96)	7	487
Nov	281	(129)	665	817
Total	1,066	(247)	676	1,495

Consistent with our process to work with CLECs to close outstanding PONs, Verizon researched the 1,495 PONs. The status of the PONs as of December 13th is shown in Table 4.

Table 4: WorldCom Current Status and Corrective Actions

	WCOM List of 12/07/00	Billing Completed	WCOM SUPPd	WCOM Cancelled	WCOM Action Required	VZ Identified WCOM Action Required	VZ Identified further VZ Action Required	Under Investigation by Verizon
Month		(1)	(2)	(3)	(4)	(5)	(6)	(7)
Jun	26					2	17	7
Jul	93	1		1		10	69	12
Aug	40	11		1		13	10	5
Sep	32	3			1	12	13	3
Oct	487	34		3	1	226	191	32
Nov	817	52	12	17	9	125	12	590
Total	1,495	101	12	22	11	388	312	649
		Close	Close	Close	Action req	Action req	Action req	Action req

In summary, 135 PONs should be closed by WorldCom. Of these 101 have moved to Billing Completion status, 12 had been supplemented and should proceed to completion and be closed, and 22 PONs were cancelled by WorldCom. This leaves 1,349 PONs that require further action. Of these, 649 require further analysis by Verizon, 312 require further action by Verizon and 388 require action by WorldCom.

Update on Internal Verizon Cancels

WorldCom misunderstands the information provided in Mr. Ray Wierzbicki's letter of October 19, 2000 to Mr. Marcel Henry of WorldCom concerning delayed status notifiers in NY. The letter indicated that "The primary cause for delayed notification in New York were PCDs and Verizon's cancellation of service orders without communicating this status to WorldCom." That is to say, these were the top two causes among many that were identified during Verizon's investigation of WorldCom's outstanding Trouble Ticket PONs leading up to the October 19th letter. During Verizon's analysis, situations were identified where orders had been cancelled internally to Verizon without concurrence from WorldCom. These situations had occurred when Verizon cancelled an order based on direct feed back to the field technician from the end customer. Verizon has reinforced to its personnel that orders cannot be cancelled without concurrence from WorldCom. The most recent analysis by Verizon of current WorldCom outstanding PONs indicates that this is no longer an issue and we do not expect it to be in the future.

Summary

Verizon continues to work with WorldCom to resolve outstanding PONs. It is a research-intensive process that involves work on both sides. In the course of the Verizon investigation, Verizon does indicate to WorldCom the reason the PON has not progressed to the expected status (and subsequent notifier generation) as well as the corrective action required. In some cases, WorldCom must take an action to move the PON back into the business process, in some cases the action is Verizon's. However, WorldCom and the Commission should understand that some of the PONs will never reach provisioning completion. These are the PONs for which Verizon indicates WorldCom must submit a

supplemental order to cancel. Although not an exhaustive list, examples are given in Table 1 above.

Completion of orders requires cooperative effort between Verizon and WorldCom. It is not the case that 100% of orders submitted by WorldCom will reach billing completion status. This is not due to systems constraints at Verizon, but is reflective of both the interdependence of Verizon and the CLEC to process orders, as well as end-customer behavior. Verizon has implemented methods, procedures and systems to ensure that the vast majority of orders proceed through the ordering, provisioning, and billing life cycle as expected, but all parties should expect to handle exceptions. Verizon provides tools and procedures to assist CLECs and ourselves in the identification and resolution of exceptions. These include the exchange of status notifiers during normal course of business and systems operations (Queries, Confirmations, Jeopardies, Provisioning Completions, Billing Completions), the automated Service Order Inquiry transaction, Electronic Jeopardy reports (OQS), and the PON Exception trouble ticket process.

Sincerely,

William R. Allan

cc: Curtis Groves, WorldCom (by e-mail)



**JOINT DECLARATION OF
SHERRY LICHTENBERG
& MINDY CHAPMAN**

ATTACHMENT 11



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January 5, 2001

BY EMAIL AND OVERNIGHT COURIER

Mr. Daniel M. Martin
New York Department of Public Service
Three Empire State Plaza
Albany, New York 12223-1350

Re: WorldCom's Request for Expedited Dispute Resolution

Dear Mr. Martin:

By letter dated December 5, 2000, WorldCom, Inc. ("WorldCom") requested Expedited Dispute Resolution ("EDR") to resolve the growing backlog of WorldCom's UNE-P orders that are awaiting EDI status notifiers. WorldCom identified more than two thousand orders that were awaiting either firm order confirmations ("FOC") or completion notices (either Provisioning Completion Notices ("PCN") or Billing Completion Notices ("BCN")). WorldCom's attempts to clear the order backlog through business-to-business contacts with Verizon have failed. As a result, WorldCom asked the Commission to intervene in order to:

1. Clear the order backlog;
2. Obtain a root-cause analysis from Verizon to explain why the identified orders were not provisioned;
3. Eliminate those root causes; and
4. Require Verizon to respond to WorldCom's trouble tickets in a timely, meaningful fashion (some tickets have been open since June).

Verizon's December 15, 2000, response purports to address the issues raised in WorldCom's request for EDR. Verizon claims: (1) that it provides status to WorldCom on each purchase order number ("PON") that is the subject of WorldCom's trouble tickets; (2) that it meets regularly with WorldCom to address the issues at hand; (3) that the trouble ticket process works as is; and (4) that cancellation of WorldCom's orders by Verizon is no longer an issue.

As WorldCom discusses herein, Verizon's response misses the point. The heart of Verizon's response is that it provides WorldCom with status on every trouble-ticket PON, and that it is working on our issues. However, in reality, even if Verizon did provide status on every trouble-ticket PON (it does not), status is not enough. First, the status that Verizon provides is largely meaningless and very often redundant information. Second, WorldCom needs the EDI status notifiers that are the subject of its trouble tickets, not a status report. This is not news to Verizon; WorldCom made this perfectly clear during the EDR regarding ECXpert, and the Commission's orders in that proceeding ordered as much.¹ WorldCom is owed an EDI response on each of its orders. Verizon's December 15 response does not adequately address its failure to provide those EDI responses.

As is also discussed below, Verizon's response is deficient further in that it fails to identify the root causes of the delayed or missing status notifiers and does not address the inadequacies of Verizon's Help Desk. Finally, Verizon's claims regarding its cancellation of WorldCom's orders requires further exploration and explanation.

¹ Cases 00-C-0008 and 00-C-0009.

In sum, WorldCom requests the following to bring prompt closure to this issue:

1. Immediate modification to the "% Missing Notifier Trouble Ticket PONs Cleared Within 3 Business Days" metric in the PAP, so that the metric accurately measures Verizon's performance, and the incorporation of the revised metric into the Carrier-to-Carrier Guidelines as metric PO-9.
2. Verizon's immediate clearance of WorldCom's order backlog by providing WorldCom with the delayed or missing EDI status notifiers that are the subject of WorldCom's trouble tickets.
3. A root cause analysis explaining why the PONs that are the subject of WorldCom's trouble tickets did not receive status notifiers, and an action plan to eliminate those causes.

I. **DISCUSSION**

A. Verizon's Performance Reporting Under the PAP Masks its Failure to Clear Trouble Tickets in A Timely Manner.

The backlog of WorldCom's UNE-P orders is getting larger, not smaller, despite WorldCom's weekly meetings with Verizon, its executive escalation of this matter, and its request for EDR. As of today, the backlog stands at 2442 orders. Of these 2442, some date back to June 2000.

As of 1/5/00	Pending FOCs	Pending PCNs	Pending BCNs
June	0	9	64
July	0	7	23
August	3	19	5
September	9	24	22
October	19	166	182
November	17	164	146
December	67	814	399
January	0	283	0
Total	115	1486	841
TOTALS	2442		

The increasing backlog indicates a clear problem with Verizon's responsiveness to WorldCom's trouble tickets and its attention to this problem. The bottom line is, regardless of Verizon's representations that it is actively engaged to resolve these items, the problem is not getting any better. This may be attributed to a number of factors, but key among them is that by unilaterally deciding to differentiate between "clearing" a trouble ticket and "closing" a trouble ticket, Verizon has introduced an unmeasured interval into the time it takes to resolve WorldCom's trouble tickets and provide us with EDI status notifiers.

As part of the resolution of Cases 00-C-0008 and 00-C-0009, the Commission ordered Verizon to modify the Performance Assurance Plan ("PAP") to include a Special Provision to measure the percentage of missing notifier trouble ticket PONs cleared within three days.² The Commission's order contemplated the incorporation into the PAP of the metrics described in Attachment A to the FCC's Consent Decree³ regarding the same matter.⁴ As described in Attachment A, if a CLEC opens a trouble ticket for missing notifiers, "[t]he ticket is considered cleared when [Verizon] has either requested the CLEC to resubmit the PON or communicated the current status of the PON and provided the delayed status notifier to the CLEC."⁵ Verizon's own PAP includes identical language, which leaves no doubt that a trouble ticket is cleared under only two circumstances:

² Cases 00-C-0008, 00-C-0009, 99-C-0949, Order Directing Market Adjustments and Amending Performance Assurance Plan, Mar. 23, 2000, at 4.

³ File No. EB-00-IH-0085, In re: New York Telephone Company (d/b/a/ Bell Atlantic-New York) Consent Decree, FCC 00-92 ("Consent Decree").

⁴ Order Directing Market Adjustments and Amending Performance Assurance Plan, at 3, n. 1.

⁵ Consent Decree, Attachment A.

1. Verizon has requested that the CLEC resubmit the PON; or
2. Verizon has –
 - a. Communicated the current status of the PON and
 - b. Provided the delayed status notifier to the CLEC.⁶

Nevertheless, despite this Commission's clear directive to incorporate the FCC metrics and the clear language both in the Consent Decree and the PAP, Verizon has, since the inception of this metric, failed to follow the rules. As Verizon states in its December 15 response, Verizon believes it can clear a trouble ticket solely by providing a status report to the CLEC. In Verizon's own words, "Verizon 'clears' the trouble ticket PON by re-flowing or statusing the PON as described above."⁷

Despite Verizon's longstanding insistence expressed in the Carrier Working Group that it can rightfully clear a trouble ticket by merely providing status, that practice is a blatant misapplication of the metric. Verizon thus "clears" tickets for purposes of the metric without the required resolution. Verizon notes that it does not "close" the ticket until some later date, presumably when the PON in question is resolved. But the distinction between "cleared" and "closed" is a Verizon invention not contemplated by the PAP, and the interval between "cleared" and "closed" is wholly unmeasured. As a result, Verizon is able to report performance under this metric that masks its true performance and has no incentive, financial or otherwise, to make any further effort beyond providing status in order to address trouble tickets.

⁶ PAP, at 13. *See also* Attachment I.

⁷ December 15 Response, at 2.

To illustrate the failure of the metric, and thus the lack of incentive for Verizon to provide anything but a status report on our trouble tickets, consider the following example:

Day One: WorldCom opens trouble ticket
Day Four: Verizon "clears" ticket by providing status
Day Sixty: Verizon "closes" ticket by resolving issue

Reported Result Under PAP: Trouble ticket cleared within 3 days.

Despite not resolving the issue underlying the trouble ticket for two months (not an uncommon occurrence), Verizon, by providing WorldCom with a "status" report, reports that it has cleared the trouble ticket and avoids any financial consequences for its failure to provide an EDI notifier within three days.

To resolve this issue, WorldCom requests that the Commission clarify Verizon's reporting obligations under this special provision of the PAP, and that the definitional language in the PAP immediately be revised to read as follows, to include the underlined language, "*if one is due.*"

PO-9 Timeliness of Trouble Ticket Resolution

The percent of EDI missing notifier trouble ticket PONS cleared within 3 business days from the day of receipt of the trouble ticket. The elapsed time begins with receipt at the Verizon Systems Support Help Desk of a trouble ticket for EDI missing notifiers (i.e., order acknowledgement, order confirmation, order rejection, work completion, and billing completion notices) with the PONS in questions enumerated with the appropriate identification. The ticket is considered cleared when Bell Atlantic has either requested the CLEC to resubmit the PON or communicated the current status of the PON and provided the delayed status notifier to the CLEC if one is due. Tickets received after 5 PM and trouble ticket clearances sent after 5PM will be considered effective on the following business day. Performance will be based on the time that the trouble ticket is received.

- The PONs shall be considered to be timely cleared if Verizon provides the status notifier after 3 business days at the request of the CLEC or because of CLEC system capacity or availability may cause VZ to miss the 3 day target.
- Out of sequence notifiers. This type of ticket indicates that the CLEC has received one or more notifiers for a PON but not in the sequence expected.

90% threshold for Special Provisions

Company:		Geography:	
• CLEC aggregate		• State	
Products	• EDI Notifier Trouble Tickets		
PO-9-01	% Missing Notifier Trouble Ticket PONS Cleared within 3 Bus. Days		
Calculation	Numerator	Denominator	
	Number of EDI missing notifier trouble ticket PONS in denominator cleared within 3 business days after receipt.	Total number of EDI missing notifier trouble ticket PONS submitted.	

WorldCom and other CLECs have repeatedly requested this revision in the Carrier Working Group, and Verizon has each time rejected the request.⁸ Verizon's main complaint with this metric is that it cannot provide a status notifier if one does not exist. WorldCom's proposal clearly addresses this concern. If a status notifier does not exist because it is not due, then Verizon cannot provide the notice and should not be held accountable for not doing so. However, if a status notifier is due but does not exist because of some action or inaction by Verizon, Verizon absolutely must be held

⁸ It is, in fact, dispute over this sentence, and the import thereof, that has kept the Carrier Working Group from reaching consensus on this metric.

accountable by this metric for its failure to provide the notice and must provide the notice within three days. That was the clear intent of the FCC and this Commission in adopting this metric: to compel timely production of EDI notifiers.

B. Status Reports Are Not Always Provided, Are Often Not Timely, And, In Any Event, Are Largely Meaningless.

Verizon's December 15 response indicates that Verizon either re-flowed each notifier to WorldCom or provided WorldCom with status within three days. WorldCom respectfully disagrees. For many PONs, WorldCom does not receive any meaningful status information from Verizon that indicates when the order will be completed. For example, we frequently receive status information that merely states that the order is with the TISOC – and no further indication of when the order will be worked and eliminated from the backlog. Additionally, when WorldCom does receive status, we often receive it much later than within three business days.

In any event, it is important to understand why the status reports that Verizon provides WorldCom are not sufficient.

First, as WorldCom discussed at length in Cases 00-C-0008 and 00-C-0009, and as Staff well understands, WorldCom is owed EDI responses for every order. As fully discussed in the February 22, 2000, affidavit of Mindy J. Chapman, not only does Verizon's practice of providing manual status reports not comply with this Commission's orders, it does not meet the business needs of WorldCom or any other CLEC that has established electronic interfaces and systems to serve customers on a mass market

basis.⁹ WorldCom's systems function on EDI notifiers. Manual spreadsheets are no substitute.

Second, Verizon's status reports are not all they are cracked up to be. We do not, for example, receive the relatively detailed type of information that appears in Table 1 of Verizon's December 15 response by way of any status reports. WorldCom, in fact, has never seen this type of detail in any status report provided by Verizon.¹⁰

Instead, the status that Verizon provides, and on the basis of which it clears trouble tickets, generally lets us know nothing more than "in progress" or "Verizon researching." This tells us nothing. We know the notifier hasn't been produced, and we know it's in progress. Otherwise, we would not have opened a trouble ticket. Verizon's status reports essentially tell us only what we already know: that we haven't received the notice yet. It defies logic that this type of status report would be of any use to WorldCom.

WorldCom has invested in automated systems in order to provide New York residential customers with a competitive option to Verizon. In order for us to do so, we must receive the EDI notifiers that we are owed, in a timely fashion. There is no substitute for those notices – and, as discussed above, Verizon's status reports are wholly inadequate. The backlog of orders with missing notifiers now exceeds 2400, with some trouble tickets dating back to June. WorldCom needs this backlog to be cleared immediately by Verizon providing us with EDI responses for each of our orders.

⁹ Cases 00-C-0008, 00-C-0009, Affidavit of Mindy J. Chapman on behalf of MCI WorldCom, Inc., Feb. 22, 2000.

¹⁰ For WorldCom to obtain this type of information, representatives must call Verizon and inquire on a PON-by-PON basis. Clearly, such a manually intensive process is unworkable.

C. Verizon's Response Does Not Address Root Cause.

Verizon's December 15 response to WorldCom's EDR request completely avoids addressing the root cause of the problem. This failure to provide Verizon-related reasons why WorldCom has not received notifiers is eerily and alarmingly similar to Verizon's avoidance of root-cause analysis in Cases 00-C-0008 and 00-C-0009 and elsewhere. By Verizon's own calculation, nearly 1000 of WorldCom's orders, as of December 7, either required further action by Verizon or were under investigation by Verizon. But Verizon provides no reasons why WorldCom's orders require further Verizon action, nor why Verizon has not taken that action. Similarly, we are given no clue as to what "under investigation by Verizon" means. In order to eradicate this problem of an order backlog and missing notifiers once and for all, WorldCom requires a root-cause analysis of what is causing the backlog and an action plan from Verizon to eliminate the cause(s). Again, this is not a new request. In a May 23, 2000, letter to Staff, WorldCom stated:

Bell Atlantic must provide a root-cause analysis to explain why a percentage of WorldCom's April and May orders (post-Netlink) remain pending and why it is taking Bell Atlantic so long to clear those orders after they become past due. WorldCom has asked for root cause analyses throughout this proceeding, and they have rarely been forthcoming. It is unclear to WorldCom whether these BCNs have been lost by Bell Atlantic's OSS – much like Bell Atlantic's OSS lost orders prior to Netlink implementation – or whether there are other explanations. To WorldCom, the orders simply appear to be missing. WorldCom therefore requests not only that Bell Atlantic provide these notices, but that Bell Atlantic provide root cause analysis as to why they have been missing, so that whatever the problem may be, it can be addressed in a manner that assures that we can stop adding to the backlog as we endeavor to reduce and eliminate it.¹¹

¹¹ Letter from C. Groves, WorldCom, to D. Martin, NYDPS, May 23, 2000, at 6.

Those words ring as true today as they did over seven months ago, when they were written. There can be any number of reasons why WorldCom is not receiving notices on these orders. Verizon has said that the problem no longer is related to the transmission of data, as was the case with the faulty ECXpert software; the Commission has agreed, and WorldCom has no reason to disagree, either. However, something is causing WorldCom not to receive notices on a portion of its orders. Until Verizon explains what is causing the problem, analyzes it, and sets out to eliminate it, we will make no progress in this effort.

One cause that Verizon did identify is that Verizon technicians sometimes cancel WorldCom's orders unilaterally.¹² Verizon, of course, cannot cancel WorldCom's orders. Verizon knows this and has acknowledged in the weekly meetings between the companies that the problem of Verizon technicians canceling WorldCom's orders is one of human error.

Recent data demonstrates that the problem of Verizon canceling WorldCom's orders has subsided. However, we know from our OSS experiences to date that human error can never be eliminated completely. Verizon, in its December 15 response, tells Staff and WorldCom that the problem is no longer an issue. To better understand Verizon's claimed resolution, WorldCom hereby requests the following:

1. A description of the training Verizon delivered to its technicians to reinforce that they cannot unilaterally cancel WorldCom's orders, including a copy of the training materials;
2. An explanation of what steps, if any, Verizon has implemented within its systems or otherwise to ensure that Verizon representatives cannot cancel WorldCom's orders without WorldCom's prior concurrence; and

¹² Letter from R. Wierzbicki, Verizon, to M. Henry, WorldCom, Oct. 19, 2000.

3. A copy of the analysis that Verizon references on page five of its December 15 response, which analysis Verizon relies upon to assure Staff that the cancellation problem has gone away.

Assuming, however, that the human errors that have caused WorldCom's orders to be canceled cannot be completely eradicated, it is imperative that there be improved communication, both between Verizon and WorldCom and within Verizon itself. With respect to intercompany communication, if Verizon does cancel a WorldCom order, we must be notified of such cancellation. Currently, we receive no such notice. That notice needs to be sent as soon as Verizon learns of the cancellation, and it should be sent via EDI. Second, with respect to communication within Verizon, we need Verizon: (1) to monitor more closely whether its technicians are canceling WorldCom's orders; (2) to train its technicians more effectively so that this practice is eliminated; and (3) to reflow any canceled orders as soon promptly as possible, to minimize impact on the end-user customer.

II. **CONCLUSION**

It simply isn't good enough for Verizon to rely upon its regular meetings with WorldCom and its provision of status reports in lieu of EDI notices. As discussed herein, the weekly meetings are not yielding any progress on the order backlog, and the status reports are largely meaningless. In order to resolve the customer-impacting problems associated with these delayed or missing notifiers, WorldCom respectfully requests the following:

1. Immediate modification to the "% Missing Notifier Trouble Ticket PONs Cleared Within 3 Business Days" metric in the PAP as described herein, and the incorporation of the revised metric into the Carrier-to-Carrier Guidelines as metric PO-9.

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2. Immediate clearance of WorldCom's order backlog by providing WorldCom with the EDI status notifiers.
3. A root cause analysis explaining why the relevant orders did not receive status notifiers, and an action plan to eliminate those causes. Such root-cause analysis should include the information requested herein regarding Verizon's cancellation of WorldCom's orders.

WorldCom looks forward to a face-to-face meeting with Verizon and Staff to address these issues.

Very truly yours,



Curtis L. Groves

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